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April 4, 2006

Patrick Sorek, Esquire
Leech Tishman Fuscaldo & Lampl
125 William Penn Place, 30th Floor
Pittsburgh, PA 15219

**RE: Brown v. Hamot Medical Center
C.A. No. 05-32 Erie**

Dear Mr. Sorek:

I write on behalf of John Lubahn, M.D., John Hood, M.D., Gary Cortina, M.D., Vincent Rogers, M.D., Mary Beth Cermack, M.D., Mark Suprock, M.D., John Kastrup, M.D., D. Patrick Williams, M.D., David Babins, M.D. and Nick Stefanovski, M.D. (collectively, "Third Party Doctors") and submit the following response to the subpoena issued February 27, 2006.

The Third Party Doctors object to Request Nos. 1 through 6 and 9 through 14 as being unduly burdensome and oppressive in both the nature and time period of the requests. The Third Party Doctors further object on the basis that these requests are irrelevant and appear to be intended to harass and embarrass them. Without waiving these objections, the Third Party Doctors have no documents responsive to Request Nos. 1 through 6 and 9 through 14.

The Third Party Doctors object to Request Nos. 7 and 8 as being unduly burdensome and oppressive in both the nature and time period of the requests. The Third Party Doctors further object on the basis that these requests are irrelevant and appear to be intended to harass and embarrass them. The Third Party Doctors incorporate, by reference, their Motion to Quash or Modify Subpoena and brief in support thereof.

OF COUNSEL:
WILLIAM C. SENNETT
EDWIN L.R. MCKEAN

EXHIBIT

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Please contact me if you have any questions or concerns.

Very truly yours,

KNOX McLAUGHLIN GORNALL &
SENNETT, P.C.



Mark J. Kuhar

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c: Dana Ashley, Employee Relations
Hamot Medical Center

Kerry Richard, Esq.